



Docket ID (BLS-2024-0001) /Standard Occupation Classification (SOC)—Updates for 2028: NC COA’s Public Comment Submission

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Thank you for the opportunity to provide input as the Office of Management and Budget (OMB) considers revisions to the 2028 Standard Occupational Classification (SOC).

About the North Carolina Coalition on Aging

The [North Carolina Coalition on Aging](#) (NC COA) is a 501(c)(3) organization that works to improve the quality of life for older adults in North Carolina through collective advocacy, education, and public policy work. We have a broad-based membership of advocacy organizations, service providers, trade associations, people who rely on services and family caregivers.

NC COA members are increasingly experiencing situations where older adults and people with disabilities are not able to receive the assistance they need due to workforce shortages. Individuals who need home or facility-based care are unable to discharge from acute care. And those who are receiving services in the appropriate setting are often not getting the duration or level of care they need.

In response to this ever-growing need, NC COA partnered with PHI, a national authority on direct care worker policy, to launch the Essential Jobs, Essential Care (EJEC) initiative to identify and implement a systems-level policy advocacy agenda. Through this work, we are building a broad coalition of stakeholders to advance policy reforms that will: strengthen direct care workers’ economic security; stimulate workforce innovations; and improve workforce-related data collection, monitoring and evaluation. Now in its fourth year, EJEC has become a multi-sector coalition of service providers, individuals with lived experience, direct care workers and advocates, all committed to improving the state of NC’s direct care workforce.

Scope of Comments

We are writing specifically on OMB’s request for comments on: “whether to consider the addition of new detailed occupations or occupational groups, including specifically care workers” and “possible changes to major, minor, and broad occupation groups.”

While the federal priority must remain on the recruitment and retention of a robust direct care workforce, *regardless* of the classification, NC COA offers recommendations on the current SOC occupations based on the collective experience of our membership.

We are writing specifically about SOC occupations:

- Nursing Assistants (31-1131.00);
- Home Health Aide (31-1121.00);
- Personal Care Aides (31-1122.00); and
- the potential need for a new occupational category, as outlined below.

Recommendations:

1. Include critical and inherent competencies not currently reflected in the applicable SOC Definitions and related Work Activities. Specifically,
 - a. conflict management and management of often complex interpersonal and intrafamily relationships;
 - b. participation in interdisciplinary care teams and service planning; and
 - c. development of subject matter competencies broader than the skills required to provide hands on assistance with Activities of Daily Living (eating, bathing, etc.). These supplemental skills include (but are not limited to) disease management, behavioral health support and working in client-directed service models.

While some of these skills may be indirectly “buried in the fine print” of the applicable SOC Occupation Tasks or Work Activities, they are largely omitted, and we urge you to more clearly integrate them into the SOC occupation definitions.

2. Better reflect the frequent and important function of assisting an individual to access community life, including providing support in the workplace. This recommendation is most applicable to Home Health Aide (31-1121.00) and Personal Care Aide (31-1122.00) SOC occupations. Workers in these occupations are often supporting individuals to access and participate in their larger communities, including the workplace. The current definitions do not reflect this reality, or the additional skills required.
3. NC COA supports the development of an additional occupation entitled “personal support” (or a comparable term) that reflects the role of supporting an individual *without* ADL support needs to navigate everyday life. This category is needed to validate the work required to perform this function and to clearly distinguish it from other categories which integrate hands-on assistance. We defer to others’ expertise whether this classification is housed under the Major Group of Healthcare Support Occupations or elsewhere in the SOC.

NC COA deeply respects the work needed to ensure this essential workforce is fully and accurately reflected in workforce data. Thank you for inviting input on this important effort.